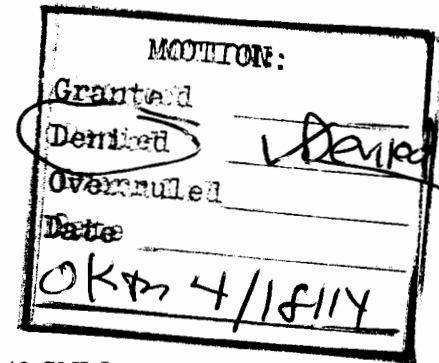


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION



UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

ALAN R. JUNG,)

Defendant.)

Case No.: 4:13CR443 SNLJ

MOTION FOR BOND REDUCTION

COMES NOW Defendant, Alan R. Jung ("Defendant"), by and through counsel, pursuant to Federal Rule of Criminal Procedure 46(a), and for his Motion for Bond Reduction, states to the Court as follows:

1. Defendant is 41 years of age and a lifelong resident of the St. Louis, Missouri area.
2. Defendant was charged under 18 U.S.C. §§ 115 and 1114 for an alleged verbal threat made to a female postal worker that occurred on or about October 3, 2014.
3. That said charges are excessive in that they rely solely on one person's interpretation of words said at a public restaurant during lunch hour.
4. That the Defendant was fully cooperative with police on the morning he was unexpectedly approached and arrested from his home in the early morning hours on October 4, 2013.
5. The current bond of No Bond is excessive.
6. The Defendant has a full support system in that he has two loving parents (Connie and Paul Jung), three brothers (Mike Jung, John Jung, and Dan Jung), four sisters (Jean Sander, Donna Puetz, Ellen Prewitt, and Sharon Russell), numerous nephews and nieces, and numerous